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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**3:16-CR-00051-BR**

**v.**

**AMMON BUNDY, et al.,**

**MOTION FOR PROTECTIVE ORDER**

**Defendants.**

The United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and through Ethan D. Knight, Geoffrey A. Barrow, and Craig J. Gabriel, Assistant United States Attorneys, hereby moves this Court for a protective order pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, seeking to prevent the dissemination of sensitive discovery materials to persons not a party to, or involved in, this case. Good cause exists for such an order based on the affidavit of FBI Special Agent Katherine Armstrong, filed concurrently herewith. A proposed protective order accompanies this motion.

As part of discovery in this case, the government is providing defendants' attorneys of record sensitive discovery material including reports of interviews, law enforcement reports of investigative activity, reports of analysis of relevant evidence, and copies of seized physical evidence in electronic form.

It is requested that this Court order that the discovery material provided in this case may be given only to the following individuals:

- (1) The defendants in this case;
- (2) Persons employed by the attorney of record who are necessary to assist counsel of record in preparation for trial or other proceedings in this case; and
- (3) Persons who defense counsel deems necessary to further legitimate investigation and preparation of this case.

The government also requests that this Court order defense counsel to provide a copy of the protective order to any person above who receives copies of the discovery.

The government further requests that the protective order allow any person above who receives copies of discovery from defense counsel to use said discovery only to assist the defense in the investigation and preparation of this case, and shall not allow them to reproduce or disseminate the discovery material to any other person or entity.

The protective order shall apply only to materials and documents created or written by the government, or obtained by the government through warrants or court orders. It shall not restrict reproduction or dissemination of discovery materials the government obtained through open sources (e.g., social media posts by the defendants or others, news accounts related to the events in this case, etc.).

If defense counsel believes an exception should be made to the proposed protective order, the parties will confer and then seek guidance from this Court. The parties will advise the Court by letter of any exceptions made to the protective order.

Defendants object to the proposed protective order.

Dated this 8th day of March 2016.

Respectfully submitted,

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United States Attorney

s/ Craig J. Gabriel  
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